



Order Filed on October 28, 2016
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE
Caption in Compliance with D.N.J. LBR 9004-2(c)

STERN, LAVINTHAL & FRANKENBERG, LLC
105 Eisenhower Parkway, Suite 302
Roseland, NJ 07068
Phone: (973) 797-1100
Fax: (973) 228-2679
Attorney for Secured Creditor,
Seterus, Inc. as the authorized subservicer for Federal
National Mortgage Association ("Fannie Mae"),
creditor c/o Seterus, Inc.
By: Jeanette F. Frankenberg, Esq.

In Re:

Celia R. Frederick

Debtor(s).

Case No.: 15-27858-MBK

Chapter: 13

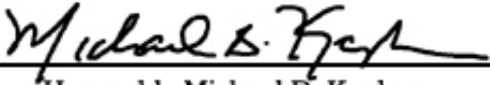
Hearing Date: September 27, 2016

Judge: Michael B. Kaplan

CONSENT ORDER RESOLVING MOTION TO VACATE STAY

The consent order set forth on the following pages, numbered two (2) through three (3), is hereby **ORDERED**.

DATED: October 28, 2016



Honorable Michael B. Kaplan
United States Bankruptcy Judge

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Debtor: Celia R. Frederick

Case No: 15-27858-MBK

Caption: Consent Order Resolving Motion to Vacate Stay

Applicant: Seterus, Inc
Applicant's Counsel: Stern Lavinthal & Frankenberg, LLC
Debtor's Counsel: Daniel E. Straffi, Esq.
Property Involved ("Collateral"): 22 Westbrook Drive, Toms River, NJ 08757

Relief sought:

- ✓ Motion for relief from the automatic stay
- Motion to dismiss
- Motion for prospective relief to prevent imposition of automatic stay

against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 4 months, from 05/01/2016 to 08/01/2016.
- The Debtor is overdue for 4 payments at \$732.63 per month.
- Less Funds held in debtor(s) suspense (\$478.95).

Total Arrearages Due \$2,451.57

2. Debtor must cure all post-petition arrearages, as follows:

- Debtor has accepted a trial modification offered by the Secured Creditor.
- Debtor has agreed to make three consecutive trial modification payments beginning September 1, 2016.
- First trial modification payment is due September 1, 2016 in the amount of \$701.35.
- Second trial modification payment is due October 1, 2016 in the amount of \$701.35.
- Third trial modification payment is due November 1, 2016 in the amount of \$701.35.

3. Payments to the Secured Creditor shall be made to the following address(es):

- ✓ Regular monthly payment: Seterus, Inc.
P.O. Box 11790
Newark, NJ 07101-4790

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Debtor: Celia R. Frederick

Case No: 15-27858-MBK

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In the event of Default:

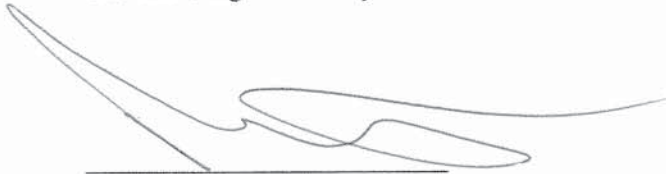
If the Debtor fails to achieve a Loan Modification as specified above and does not address the Post-Petition delinquency within fifteen (15) days of the denial date, the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtor's failure to comply with this Order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and the Debtor's attorney.

4. Award of Attorneys' Fees:

✓ The Applicant is awarded attorneys fees of \$350.00, and costs of \$176.00.

The fees and costs are payable through the Chapter 13 plan.

The undersigned hereby consent to the form and entry of the foregoing order



Daniel Straffi, Esq.
Attorney for the Debtor,
Celia R. Frederick

/s/ Jeanette F. Frankenberg, Esq.

Jeanette F. Frankenberg, Esq.
Attorney for Secured Creditor,
Seterus, Inc.